

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

FILED BY
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CLERK OF DIST. CT.
S.D. OF FL - MIAMI
D.C.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to Foxwoods Resort, Connecticut, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently serving a three year supervised release portion of his sentence imposed by this court on or about November 2001.
2. That the Defendant has been on supervised release since August 22, 2003.
3. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Foxwoods Resort, Connecticut, for the purpose of visiting with his children.
4. That the Defendant desires to travel outside of the State of Florida for approximately Three (3) days beginning on or about November 21, 2003 and returning November 23, 2003.
5. That undersigned has spoken to Anthony F. Gagliardi of United States Probation, regarding this travel permit and he has suggested that a motion be filed with the court.
6. That the Defendant will provide addresses and telephone numbers where he will be staying to Anthony F. Gagliardi of the United States Probation, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

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WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to Foxwoods Resort, Connecticut.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has contacted Mr. McCormick by telephone and has left a message. At the time of the filing of this instant motion, undersigned has not received a return call from Mr. McCormick as to his position.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and U.S. Mail Delivery; and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 12th NOVEMBER, 2003.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
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By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341